



## NATURAL RESOURCES COMMISSION

LARRY DEVUYST  
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MARLENE J. FLUHARTY  
GORDON E. GUYER  
DAVID HOLLI  
O. STEWART MYERS  
RAYMOND POUPORE

JOHN ENGLER, Governor

## DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING  
P.O. BOX 30028  
LANSING, MI 48909

ROLAND HARMES, Director

US EPA RECORDS CENTER REGION 5



472084

March 30, 1992

Ms. Mary Beth Novy, HSRW-6J  
U.S. EPA, Region 5  
77 W. Jackson Blvd.  
Chicago, IL. 60604

Dear Ms. Novy:

Subject: Comments on the Draft Work Plan, Draft Sampling and Analysis Plan  
and Draft Health and Safety Plan for the Albion-Sheridan Township  
Landfill Superfund site

Our review of the above listed documents is complete. For your convenience, I  
have listed our comments by page number, section number, paragraph and  
sentence. Comments generated by our geologist are attached as a separate  
document.

Work Plan - RIPage Number

As was discussed, there should be a description of the nature of the  
"streamlining process" somewhere up front in the work plan.

1-3 Sec. 1.1.3.1 - para 3 - After our walk-through on 3/18/92, it appeared  
that we may not have enough data to make a declaration as to whether or  
not this area northwest of the site is or is not a wetland.

1-4 Sec. 1.1.3.2 - para 1 - top of page - Even though the three existing  
monitor wells are most likely of little value, Rick Tripple and I were  
discussing the merits of using the wells for some other non-analytical  
needs, such as static water level measurements, etc.

1-4 Sec. 1.1.3.2 - para 2 - The Marshall formation is extensively fractured  
and can provide high volumes of fairly high quality water. Local data  
suggests that this aquifer is moving west-southwest and that the drift  
aquifer is moving to the south-southwest.

1-4 Sec. 1.1.3.3 - para 1 - line 5 - are these values the result of total  
metals analysis or some other analytical means?

1-5 Sec. 1.1.3.3 - para 1 - Is there any organic or heavy metal data  
available for these on-site wells?

**Page Number**

- ✓ 1-5 Sec. 1.1.3.3 - para 3 - last line - Unless WWES is trying to be diplomatic about this information, the sentence should be changed to read "TCE contamination has been shown to be associated with operations..", since there is more than enough data to support this statement.
- ✓ 1-6 Sec. 1.1.3.4 - para 1 - In order to maintain consistency, we suggest that the word "site" be used in place of "facility" in this paragraph.
- 1-6 Sec. 1.1.3.4 - para 2 - Brooks Foundry has 2-3 high volumn output production wells. These may have been responsible for a large influence on the aquifer and may have drawn contaminants from the Albion-Sheridan landfill to areas west of the fill that were not otherwise contaminated. These wells were sampled and analysis performed by MDNR several years ago in conjunction with the McGraw-Edison problem. There were no contaminants found in the wells at that time.
- Ask Gene for data*
- ✓ 1-6 Sec. 1.1.3.4 - para 4 - line 3 - comma between "areas" and "footprints" instead of a semicolon.
- ✓ 1-7 Sec. 1.1.3.4 - para 1 - Regional flow of the drift aquifer is thought to be to the south-southwest. Available data seems to indicate that, at least locally, the bedrock aquifer is flowing to the west-southwest.
- ✓ 1-7 Sec. 1.1.4 - para 3 - line 3 - strike the "n" in the word "an" at the end of the sentence; line 5 - strike "n" in the word "an" between "(TAT) and U.S."; line 8 - we suggest the use of the word "refuse" to replace "waste debris".
- ✓ 1-7 Sec. 1.1.5 - para 1 - second and third bullets - We suggest using the word "covered" in place of the word "capped".
- ✓ 1-8 Sec. 1.1.5 - Add a bullet for "background soil and groundwater quality".
- ✓ 1-9 Sec. 1.1.6 - first para after fifth bullet from top - We assume that "RA" stands for "Risk Assessment". This is the first place this acronym appears and no definition for it was previously given. We suggest defining it here.
- ✓ 2-1 Sec. 2.2 - second bullet - Would this include "hot spots"?
- ✓ 2-5 Under Subcontractor Services - add bullets for excavation of test pits and disposal of purge and de-con water.
- ✓ 2-7 Sec. 2.5.2 - para 1 - We suggest including the elevational survey of the existing on-site monitor wells in the site survey. They may be useful for measuring static water levels as well as other non-critical parameters.

✓ 2-9 Sec. 2.5.6 - para 1 - line 4 - At the end of the sentence, add "and discrete areas of identifiable drummed waste". It is our feeling that, if drummed waste is identified within the fill, at a minimum, the waste they contain must be characterized, regardless of whether or not any remedial action is planned for the drums.

✓ 2-9 Sec. 2.5.7 - para 2 - Once again, the drift aquifer appears to be flowing to the south-southwest and the bedrock aquifer appears to be flowing to the west-southwest.

What? 2-10 Sec. 2.5.7.2 - para 1 - It would seem at this point in time that it may be a good idea to log some of the drift wells as well as the bedrock wells.

✓ 2-10 Sec. 2.5.7.3 - para 1 - Another goal of installing the monitor wells it to establish background water quality.

✓ 2-11 Sec. 2.5.7.3 - para 2 - Is the field analysis to be performed by a GC? If so, you may want to describe the situation.

✓ 2-11 Sec. 2.5.7.3 - para 4 - Page 2-10 Sec. 2.5.7.3, para 1 states that 22-32 wells will be needed. Which is correct?

✓ 2-14 Sec. 2.5.11 - para 1 - The SAP on page 2-22, Sec. 2.9.1, para 1, states the 15-17 private wells will be sampled. Which is correct?

✓ 2-14 Sec. 2.5.11 - para 1 - line 8 - Page 1-4, Sec., 1.1.3.2, states that 2 supply wells service the subdivision, which is a correct statement. This sentence should be changed to reflect this fact.

✓ 2-14 Sec. 2.5.12 - para 1 - Will this modeling be done in spite of the streamlining. Our 3/19 discussions concluded that no air sampling will be done. Is this still the case?

Discuss 2-16 Sec. 2.5.13 - para 1 - Will samples of terrestrial and/or aquatic biota be collected?

Discuss 2-17 Sec. 2.9 - As per our discussions on 3/19, if MCL's are exceeded, will the Risk Assessment be completed any way?

EMC **Work Plan - FS**

Discuss 3-1 Under the streamlining process, will it be necessary to follow every step of the requirements for development of the FS?

Liz **Sampling and Analysis Plan**

✓ 2-3 Sec. 2.3.1 - para 4 - Please define DQO.

2-4 Sec. 2.3.2 - para 1 - line 5 - Insure that the plastic is sucurely wrapped and is stored away from possible contaminants.

✓ 2-4 Sec. 2.3.2 - para 1 - line 6 - Is the probe to be hand or machine driven?

✓ 2-4 Sec. 2.4.1 - Great care must be taken when drilling through refuse. Drums may be present and drilling through a drum may prove to be a safety hazard.

✓ 2-5 Sec. 2.4.1.1 - para 1 - It appears that what is intended here is to take split spoon samples through the refuse. If this is so, then once again the question of hazard arises since drilling may encounter drums of concentrated waste such as highly volatile and flammable solvents.

✓ 2-5 Sec. 2.4.1.1 - para 4 - line 6 - Following the word "odors" we suggest that the word "or color" be added.

2-6 Sec. 2.4.1.2 - para 1 - There is some evidence that refuse and industrial wastes may have been burried as deep as 25 feet or more. Given this circumstance, 10 feet will not be sufficient depth to reach wastes burried at depth and thus waste characterization and definition cannot be adequately achieved. In order to accomplish a deeper penetration of the wastes present, it will be necessary to employ a track hoe as a wheeled back hoe will not reach far enough into the hole.

Set up some limits on this. What's the diff. w/ above comment.  
✓ 2-7 Sec. 2.4.1.3 - para 2 - Measures should be taken to clearly and visibly mark each well with its identification that will withstand weathering and can be clearly identified years down the road when O & M will require regular sampling. Also, each well should be so marked that when the local vegetation grows tall years down the road, it can be found.

? 2-7 Sec. 2.4.1.3 - para 2 - Is 3' into the water table enough? During dry or drought conditions, the wells may go dry.

✓ 2-9 Sec. 2.5.1.3 - para 1 - line 4 - After the word "odor" add "or color".

✓ 2-10 Sec 2.5.2 - para 2 - line 1 - Insert "each of" between "at" and "the".

2-10 Sec. 2.5.2 - para 3 - last line - This line is redundant.

✓ 2-12 Sec. 2.5.2 - para 2 - line 6 - Strike "at" and insert "on" and add "screen" after "well".

2-12 Sec. 2.5.2 - para 4 - Monitor wells should stand at least 72 hours after being developed before being sampled.

2-13 Sec. 2.5.2.1 - para 2 - line 4 - As per our discussions on 3/19/92, if the aquifer is less than 15' thick, only one monitor well will be installed in the drift aquifer.

*Can I get this info*

WWES states in the work plan that, in general, the groundwater directional flow is to the south-southwest. This may hold true for the drift aquifer but is not necessarily true for the bedrock aquifer. There is some recent substantial data available that shows the bedrock aquifer flowing to the west-southwest. There are some contaminated private water supplies along Orchard Knoll Lane that appear to be directly west of the landfill. It is suspected that these wells are tapped into the Marshall formation, and could, therefore, be downgradient of the landfill.

As you can gather from our comments, the one overriding concern we have is that discrete areas of concentrated wastes, such as metal plating sludge, liquid waste pits, and pockets of drummed waste, should be investigated and characterized, in order to determine appropriate remedial actions for these wastes.

*based on?*

Following our meeting on March 19, 1992, our staff were briefed as to the "streamlining" process and how it applies to this site. We have some real questions regarding whether Albion-Sheridan LF meets the characterization of a "primarily municipal waste" landfill.

Some other questions/concerns arose and they are as follows:

- Streamlining good. includes this poss.*
- 1) If indications of concentrated wastes are found during the field investigation, does EPA plan on or will you consider sampling these wastes?
  - 2) If drums and/or other discrete concentrated wastes are found, will EPA consider options other than those assumed in the streamlining process?
  - 3) Would EPA consider implementing a full spectrum FS if the situation warranted it due to the complexity of determining a suitable disposal method for concentrated wastes?

As I stated to you during our meeting on March 19, 1992, I will make every effort to inform you of any other potential concerns MDNR may have with the streamlining process, if they arise, so that we can address them in a timely manner.

Despite the concerns raised above, we think that this process may work if these concerns can be addressed and if it is properly employed. In order to increase the chances of success for this innovative approach, we strongly suggest that EPA make a presentation to our management so that they will understand this process and have a chance to ask questions and allay their concerns. I suggest that we get together as soon as possible to set up a date and time for this presentation.

Ms. Mary Beth Novy

(6)

March 30, 1992

If you have any questions or comments, please call me.

Sincerely,

A handwritten signature in cursive script that reads "Gene L. Hall". The signature is written in dark ink and is positioned above the typed name and title.

Gene L. Hall  
Superfund Section  
Environmental Response Division  
(517) 373-6808

cc: Ms. Claudia Kerbawy, MDNR  
Mr. Bob Delaney, MDNR